

**MANDELBAUM SALSBERG P.C.**

**Steven I. Adler, Esq.**

**Lauren X. Topelsohn, Esq.**

**3 Becker Farm Road, Suite 104**

**Roseland, New Jersey 07068**

**Ph.: 973-736-4600**

**Fax: 973-736-4670**

**Attorneys for Plaintiffs**

<b>SALERNO MEDICAL ASSOCIATES, LLP,</b>	<b>:</b>	<b>UNITED STATES DISTRICT COURT</b>
<b>SENIOR HEALTHCARE OUTREACH</b>	<b>:</b>	<b>FOR THE DISTRICT OF NEW JERSEY</b>
<b>PROGRAM, INC., and SM MEDICAL LLC,</b>	<b>:</b>	<b>CIVIL ACTION NO. 2:20-CV-10539 (KM)</b>
<b>individually and on behalf of all others</b>	<b>:</b>	<b>(JBC)</b>
<b>similarly situated,</b>	<b>:</b>	
	<b>:</b>	
<b>Plaintiffs,</b>	<b>:</b>	
<b>v.</b>	<b>:</b>	<b>APPLICATION FOR AUTOMATIC</b>
	<b>:</b>	<b>CLERK'S EXTENSION PURSUANT TO</b>
<b>RIVERSIDE MEDICAL GROUP, LLC,<sup>1</sup></b>	<b>:</b>	<b><u>LOCAL CIVIL RULE 7.1(d)(5)</u></b>
<b>UNITEDHEALTHCARE COMMUNITY</b>	<b>:</b>	
<b>PLAN, INC., OPTUM, INC., OPTUM</b>	<b>:</b>	
<b>CARE, INC., UNITEDHEALTHCARE</b>	<b>:</b>	
<b>INSURANCE COMPANY and JOHNS DOE</b>	<b>:</b>	
<b>1-20,</b>	<b>:</b>	
	<b>:</b>	
<b>Defendants.</b>	<b>:</b>	

Plaintiffs Salerno Medical Associates, LLP, Senior Healthcare Outreach Program, Inc. and SM Medical LLC (collectively, "**Plaintiffs**"), by and through their undersigned counsel, hereby request entry of a Clerk's Order extending Plaintiffs' time to respond to Defendants' Combined Motion to Dismiss for Lack of Personal Jurisdiction, Motion to Compel Arbitration, and alternatively Motion to Dismiss for Failure to State a Claim pursuant to FRCP 12(b)(6) [ECF 19] ("**Motion to Dismiss**") and in support say as follows:

1. Pursuant to the September 17, 2020 Order of the Hon. James B. Clark, III, U.S.M.J [ECF 18], Defendants were to file their Motion to Dismiss on September 22, 2020,

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<sup>1</sup> Riverside Medical Management, LLC is incorrectly identified in the caption as "Riverside Medical Group, LLC."

Plaintiffs were to file their opposition on or before October 7, 2020, and Defendants' reply was to be filed on or before October 15, 2020.

2. Pursuant to Local Civil Rule 7.1(d)(5), Plaintiffs hereby apply for an automatic fourteen (14) day extension of the time such that the Motion to Dismiss shall be returnable on November 2, 2020.

3. Plaintiffs have not previously requested an extension of time.

Dated: October 6, 2020

MANDELBAUM SALSBERG, P.C.  
Attorneys for Plaintiffs

By: /s/Lauren X. Topelsohn  
Lauren X. Topelsohn, Esq.  
3 Becker Farm Road, Suite 105  
Roseland, New Jersey 07068  
(973) 736-4600